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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

FEB **10** 2023

CLERK, U.S. BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS

In re:	Case No. 22-42492
JASON TAYLOR MARTIN	Chapter 7
Debtor.	
BRENDA PARK	Adversary Proceeding No. 23-04004-ELM
Plaintiff,	
v.	
JASON TAYLOR MARTIN	
Defendant.	
ANSWER TO COMPLAINT	

COMES NOW Jason Taylor Martin ("Defendant"), and hereby submit his Answer to Plaintiff's Complaint for Declaratory Judgment, and state as follows:

## ANSWER TO COMPLAINT

- Defendant lacks information to admit or denies averments paragraph 1. Any remainder of the paragraph is denied.
- Defendant admits averments paragraph 2.
- Defendant admits averments paragraph 3.
- 4. Defendant admits averments paragraph 4.
- 5. Defendant lacks information to admit or denies averments paragraph 5. Any remainder of the paragraph is denied.
- Defendant lacks information to admit or denies averments paragraph 6. Any remainder of the paragraph is denied.
- Defendant lacks information to admit or denies averments paragraph 7. Any remainder of the paragraph is denied.
- 8. Defendant denies averments paragraph 8.
- 9. Defendant denies all averments paragraph 9.
- 10. Defendant denies all averments paragraph 10.
- 11. Defendant denies all averments paragraph 11.
- 12. Defendant denies all averments paragraph 12.
- 13. Defendant denies all averments paragraph 13.
- 14. Defendant denies all averments paragraph 14.
- 15. Defendant denies all averments paragraph 15.
- Defendant denies all averments paragraph 16.

## AFFIRMATIVE DEFENSES

- 1. The Complaint fails to state a claim upon which relief may be granted.
- 2. Defendant reserves the right to assert additional affirmative defenses at a later date should the discovery process establish their applicability.

WHEREFORE, PREMISES CONSIDERED, Defendant request that the court enter an order that Plaintiff be denied all relief requested in this adversary proceeding, and for such other and further relief to which Defendant shall be justly entitled.

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Jason Martin, Defendant 1016 Sycamore Street

Burleson, TX 76028

Jason.martin0712@gmail.com

/Q/ocument

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following parties by first-class mail on day of February 2023:

U.S. Trustee

United States Trustee

1100 Commerce Street

Dallas, TX 75242

Chapter 7 Trustee

Laurie Rea

777 Main St., #1550

Fort Worth, TX 76102

**Plaintiff** 

Brenda Park c/o Waddell Serafino Geary et al Comerica Bank Tower 1717 Main Street, 25th Floor Dallas, TX 75201-7341

/s/Jason Martin JASON MARTIN